UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL No. 2327

Wave 12

THIS DOCUMENT RELATES TO:

Wave 13 cases listed on Plaintiffs' Exhibit A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSES REGARDING LARRY SIRLS, M.D. FOR WAVE 13

Plaintiffs filed a Notice of Adoption [Dkt. 8956] in the Wave 13 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude Certain Opinions and Testimony of Larry Sirls, M.D. and Supporting Memorandum from Ethicon Wave 2, Dkt. 2479 (motion), 2480 (memorandum in support). Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to Larry Sirls, M.D. for Ethicon Wave 3 Cases [Doc. 2936, MDL General]. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar #8691) Butler Snow LLP 1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010 (601) 985-4561 william.gage@butlersnow.com /s/ Susan M. Robinson_

Susan M. Robinson (W. Va. Bar #5169) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 24338 (304) 414-1800 srobinson@tcspllc.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
William M. Gage